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City of North Bend

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July 9, 2008

Section of Environmental Analysis
Surface Transportation Board
395 E. St. SW
Washington, DC 20423

**RE: *Docket No. AB-515 (Sub-No. 2X), Central Oregon & Pacific Railroad, Inc. –
Abandonment and Discontinuance – in Coos, Douglas, and Lane Counties,
Oregon (Coquille to Vaughn)***

Dear Section of Environmental Analysis:

The City of North Bend has received the "Combined Environmental and Historic Report" of the Central Oregon & Pacific Railroad ("CORP") regarding CORP's planned abandonment of the rail line which passes through and services the City of North Bend.

North Bend is a coastal city with a population of just under 10,000 people. North Bend was established on the Coos River estuary over 100 years ago. The timber industry has been its primary economic engine over the years. Tourism is of growing importance to North Bend since it is located at the Southern end of the Oregon Dunes National Recreation Area. Fishing is important to the community because of its proximity to the ocean, fresh water lakes, and rivers. Many of North Bend's residents rely on the tourism industry for their livelihood. Additionally, many of North Bend's residents are still employed in the timber products industry that relies on the rail line for shipping and receiving. CORP's report raises a number of issues that are troubling to the City of North Bend, and we would like to present these issues to the Section of Environmental Analysis of the Surface Transportation Board. Our number 1 concern is the effect on the economy of the City of North Bend and its residents. Until CORP embargoed the Coos Bay branch line on September 21, 2007, shippers on the line employed many of our citizens. Those shippers use the line for a large percentage of their inbound and outbound traffic. CORP's cessation of operations has forced these companies to use trucks and has put these companies in danger of going out of business.

The increased truck traffic that will result from the abandonment of the rail line creates significant issues for the City. The report notes that a total of 37,656 truck trips per year (18,828 full and 18,828 empty) will be created by the abandonment, with a great majority of these truck trips traveling through the center of North Bend on U.S. Highway 101. The magnitude of this truck traffic would negatively impact the quality of life in North Bend, because Highway 101 is one of the main streets in North Bend. There already has been an increase in truck traffic since the rail line has been shut down over the past nine (9) months. The report states, at page 9, that the increase only represents five (5) trucks per hour. The problem is that such a calculation is based on a twenty-four (24) hour work day, six (6) days per week. Analyzing a conventional nine (9) hour work day and a five (5) day work week, the increase in truck traffic is over sixteen (16) trucks per hour. Apparently the report

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disingenuous when one recognizes that US Highway 101 travels through North Bend and Coos Bay (adjoining cities) with a combined population of over 24,000 people. This truck traffic impacts traffic safety, noise, and air pollution in our community.

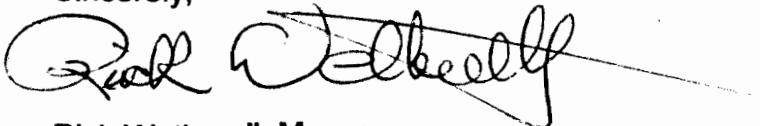
Another significant concern is that the abandonment of the rail line will result in the de-construction or salvage of the Coos Bay railroad bridge. In other words, if CORP is permitted to abandon the rail line to Coos Bay, the rail bridge over Coos Bay will have to be removed. This removal will have significant consequences. The Coos Bay estuary supports all types of recreational fishing, drawing anglers from all over the nation to fish for everything from Chinook Salmon to sturgeon in the estuary. In addition, there are approximately 156 water crossings on the Coos Bay rail line. Some of these water crossings are in close proximity to the City of North Bend, and cross over streams and lakes that are used by our citizens and tourists on a regular basis for recreation. These water crossing structures will also have to be removed. The removal will have significant consequences that must be mitigated. From the City of North Bend's perspective, this is because local fishing guides, hotels, restaurants, and other businesses benefit from the popularity of fishing and outdoor activities in the North Bend area.

It does not appear that CORP has properly addressed the environmental concerns associated with the removal of the Coos Bay rail bridge, the water crossings surrounding the North Bend area, as well as the removal of tracks in the vicinity of the estuary. Without proper environmental mitigation, the salvage activity will damage the water quality of the Coos Bay estuary by introducing sediment into the water and by increasing the possibility of future erosion from the river banks and stream banks in the area. Increased sedimentation will damage the water quality and may deter salmon and trout from the reaching the ocean and/or returning to spawn.

Additional environmental concerns arise from the bridge removal process resulting in contamination from such things as bridge debris, paint, oils, or grease. Looking at page 15 of the report, it appears that CORP is planning no mitigation actions in connection with the planned abandonment. Water quality is extremely important to the citizens of the City of North Bend and the impact of CORP's actions on our water quality need to be addressed. They have not been addressed in this report.

Thank you for the opportunity to participate in the abandonment proceeding. If you would like any further information from the City of North Bend, please feel free to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "Rick Wetherell", with a long horizontal line extending to the right.

**Rick Wetherell, Mayor
City of North Bend**

Cc: Terence Hynes